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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DOC #: X OPICINAL

UNITED STATES OF AMERICA

SEALED INDICTMENT

CORNELIO CAZAREZ MADRID,

a/k/a "Ave Felix,"

HERNAN CAZAREZ MADRID,

a/k/a "Alfredo," and

SINOHE ANTONIO ARAUJO MEZA,

a/k/a "Carrera,"

T 6 CRIM 680

Defendants.

### COUNT ONE

The Grand Jury charges:

1. From at least in or about May 2015, up to and including in or about August 2016, in the Southern District of New York, Mexico and elsewhere, and in an offense begun and committed outside of the jurisdiction of any particular State or district of the United States, CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York and whose point of entry into the United States will be in the Southern District of New York, and others known and unknown, intentionally and knowingly did

combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

- 2. It was a part and an object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).
- 3. It was further a part and an object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others known and unknown, would and did manufacture and distribute, and possess with the intent to distribute, controlled substances, intending and knowing that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).
- 4. The controlled substances that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the

defendants, conspired to (i) import into the United States and into the customs territory of the United States from a place outside thereof, and (ii) manufacture and distribute, and possess with the intent to distribute, intending and knowing that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, were (1) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 960(b)(1)(B); (2)one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A); and (3) 500 grams and more of mixtures and substances containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 960(b)(1)(H). (Title 21, United States Code, Sections 952(a), 959(a) & (d), 963; Title 18, United States Code, Section 3238.)

## COUNT TWO

The Grand Jury further charges:

5. From at least in or about May 2015, up to and including in or about August 2016, in the Southern District of New York and elsewhere, CORNELIO CAZAREZ MADRID, a/k/a "Ave

Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE
ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, and others
known and unknown, intentionally and knowingly did combine,
conspire, confederate, and agree together and with each other to
violate the narcotics laws of the United States.

- 6. It was a part and an object of the conspiracy that CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).
- MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a
  "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the
  defendants conspired to distribute and possess with the intent
  to distribute were (i) one kilogram and more of mixtures and
  substances containing a detectable amount of heroin, in
  violation of Title 21, United States Code, Section 841(b)(1)(A);
  (ii) five kilograms and more of mixtures and substances
  containing a detectable amount of cocaine, its salts, optical
  and geometric isomers, and salts of isomers, in violation of
  Title 21, United States Code, Section 841(b)(1)(A); and (iii)
  500 grams and more of mixtures and substances containing a

detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

## FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offenses charged in Counts One and Two of this Indictment, CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses charged in Counts One or Two of this Indictment.

#### Substitute Assets Provision

- 9. If any of the above-described forfeitable property, as a result of any act or omission of CORNELIO CAZAREZ MADRID, a/k/a "Ave Felix," HERNAN CAZAREZ MADRID, a/k/a "Alfredo," and SINOHE ANTONIO ARAUJO MEZA, a/k/a "Carrera," a/k/a "Apache," the defendants:
  - a. cannot be located upon the exercise of due

diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

itle 21, United States Code, Sections 853 & 970.)

FOREPERSON

PREET BHARARA United States Attorney

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

#### UNITED STATES OF AMERICA

- v. -

CORNELIO CAZAREZ MADRID,
a/k/a "Ave Felix,"
HERNAN CAZAREZ MADRID,
a/k/a "Alfredo," and
SINOHE ANTONIO ARAUJO MEZA,
a/k/a "Carrera,"

Defendants.

#### SEALED INDICTMENT

(21 U.S.C. §§ 846, 959(c) & 963; and 18 U.S.C. § 3238.)

PREET BHARARA

United States Attorney.

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